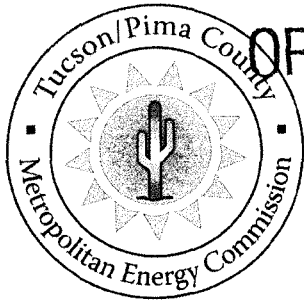




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Metropolitan Energy Commission

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City of Tucson
Dept. of Operations

November 20, 2008

RE: Docket #08-0513 E-20633A-08-0513

Dear Chairman Gleason and Commissioners:

The Tucson-Pima County Metropolitan Energy Commission, a sixteen-member appointed advisory commission of the City of Tucson and Pima County, has been involved with numerous aspects of the solar industry and solar energy production in Arizona for many years as a part of its role in advising the Mayor and Council of the City of Tucson and Pima County about energy, energy conservation, and renewable energy. We write today in support of the Solar Alliance Application for Declaratory Order that Solar Service Agreement (SSA) Providers are not Public Service Corporations.

Since a substantial number of businesses cannot afford the initial costs of solar equipment, SSA's have developed over time as an alternative mode of financing solar. Additionally, governmental agencies and non-profits cannot legally benefit directly from the solar tax credits that have become an instrumental aspect of solar financing. In many areas, SSA's have become the most common way of financing solar on businesses and governmental buildings.

Yet in Arizona it is not clear that such entities may proceed with their business of planning for and installing solar and selling the electricity without regulation by the ACC, which would increase costs and delay solar installations for no valid regulatory reason. We find the arguments of the Applicants in their application to be compelling and believe a favorable decision on this matter is very important to the growth of solar in Pima County and elsewhere in the state. The Metropolitan Energy Commission urges you to grant this application.

Sincerely,

Michael S. Guymon
Chair

Arizona Corporation Commission
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"Serving as a catalyst for the City of Tucson and Pima County to build
a more Sustainable energy future in the region."